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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 KATELYN KIM,

Case No. 2:24-cv-02140-JCC

Plaintiff,

V.

13 HUNTER WARFIELD, INC., EQUIFAX
INFORMATION SERVICES, LLC,
14 EXPERIAN INFORMATION SOLUTIONS,
INC., and TRANS UNION, LLC.

**STIPULATED MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING TO
COMPLAINT, AND {PROPOSED}
ORDER**

Note on Motion Calendar: March 10, 2025

Defendants.

STIPULATED MOTION

18 Defendant Equifax Information Services, LLC (“Equifax”) and plaintiff Katelyn Kim
19 move the Court for an Order extending the deadline for Equifax to answer, plead, or otherwise
20 respond to plaintiff’s Complaint, up to and including April 9, 2025.

1. Plaintiff filed this Complaint on December 20, 2024.

2. Equifax was served with the Complaint on January 8, 2025.

3. Equifax's time to respond to the Complaint is currently March 10, 2025.

4. Equifax requests additional time to file its responsive pleading through and

25 including April 9, 2025, so that the parties may engage in settlement negotiations.

5. Plaintiff consent to this motion.

27 6. The request is made in good faith and not for the purpose of delay.

STIPULATED MOTION FOR EXTENSION OF TIME AND [PROPOSED] ORDER - 1

Case No. 2:24-cv-02140-JCC

MARKOWITZ HERBOLD PC
1455 SW BROADWAY, SUITE 1900
PORTLAND, OR 97201
(503) 295-3085

1 7. Equifax respectfully submits that the foregoing circumstances constitute good
 2 cause and warrant granting the extension requested.

3 Wherefore, both parties respectfully request that this Court grant defendant Equifax an
 4 extension of time up to and including April 9, 2025, within which to serve its responses to the
 5 Complaint.

6 I certify that this memorandum contains 479 words, in compliance with Local Civil Rule
 7 7(e)(1).

8 DATED: March 10, 2025. MARKOWITZ HERBOLD PC

9
 10 *s/ Jeffrey M. Edelson*

11 Jeffrey M. Edelson, WSBA #37361
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 14 Portland, OR 97201
 15 Telephone: (503) 295-3085
 16 *Attorneys for Defendant Equifax Information Services,
 17 LLC*

18 SANDERS LAW GROUP

19 *s/ Craig B. Sanders*

20 Craig B. Sanders, WSBA #46986
 21 csanders@sanderslaw.group

22 *Attorneys for Plaintiff Katelyn Kim*

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 27 **STIPULATED MOTION FOR EXTENSION OF TIME AND [PROPOSED]
 ORDER - 2**
 Case No. 2:24-cv-02140-JCC

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ATTORNEY CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2025, I electronically filed the foregoing

3 **STIPULATED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE
4 PLEADING TO COMPLAINT, AND [PROPOSED] ORDER** with the Clerk of the Court
5 using the CM/ECF system which will send notification of such filing to the following:

Craig B. Sanders
SANDERS LAW GROUP
333 Earle Ovington Blvd. Suite 402
Uniondale NY 11553
Of Attorneys for Plaintiff

U.S. Mail
 Facsimile
 Hand Delivery
 Overnight Courier
 Email: csanders@sanderslaw.group
 Electronically via USDC CM/ECF system

DATED: March 10, 2025.

s/ Jeffrey M. Edelson
Jeffrey M. Edelson, WSBA #37361
Attorneys for Defendant Equifax Information Services, LLC

**STIPULATED MOTION FOR EXTENSION OF TIME AND [PROPOSED]
ORDER - 4
Case No. 2:24-cv-02140-JCC**